

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION**

Santana Bryson and Joshua Bryson,	)	
as Administrators of the Estate of	)	
C.Z.B., and as surviving parents of	)	
C.Z.B., a deceased minor,	)	Case No. 2:22-CV-017-RWS
	)	
Plaintiffs,	)	JURY TRIAL DEMANDED
	)	
v.	)	
	)	
Rough Country, LLC,	)	
	)	
Defendant.	)	

**DEFENDANT ROUGH COUNTRY, LLC'S SECOND AMENDED NOTICE**  
**OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM**  
**OF CHRISTOPHER D. ROCHE**

To: Plaintiffs Santana Bryson and Joshua Bryson  
C/O  
Tedra L. Cannella  
Robert H. Snyder, Jr.  
Devin L. Mashman  
CANNELLA SNYDER LLC  
315 W Ponce de Leon Ave  
Suite 885  
Decatur, GA 30030

YOU ARE HEREBY NOTIFIED that, pursuant to Federal Rule of Civil Procedure 30, that on **Friday, July 12, 2024 at 9:00 a.m., via Zoom**, Defendant Rough Country, LLC, will proceed to take the video deposition of Christopher D.

Roche for the purposes of discovery, cross-examination and for all other purposes allowed by law. The deposition will continue from day to day until completed. You are invited to be in attendance and participate in accordance with applicable law.

Per agreement of counsel, the deponent is to produce his entire expert file, including documents and materials set forth in Exhibit "A" prior to the deposition.

This 8th day of July, 2024.

WEINBERG, WHEELER, HUDGINS,  
GUNN & DIAL, LLC

/s/Richard H. Hill

Richard H. Hill

Georgia Bar No. 354425

Lindsay G. Ferguson

Georgia Bar No. 140970

Aaron B. Chausmer

Georgia Bar No. 119998

*Attorneys for Defendant Rough  
Country, LLC*

3344 Peachtree Road, N.E.  
Suite 2400  
Atlanta, Georgia 30326  
404-876-2700  
404-875-9433 (fax)

**CERTIFICATE OF SERVICE**

This is to certify that I have electronically served the within and foregoing  
Second Amended Notice of Taking Videotaped Deposition Duces Tecum of  
Christopher D. Roche as follows:

Tedra L. Cannella  
Robert H. Snyder, Jr.  
Devin L. Mashman  
CANNELLA SNYDER LLC  
315 W Ponce de Leon Ave  
Suite 885  
Decatur, GA 30030  
tedra@cannellasnyder.com  
rob@cannellasnyder.com  
devin@cannellasnyder.com

*ATTORNEYS FOR PLAINTIFFS*

This 8th day of July, 2024.

WEINBERG, WHEELER,  
HUDGINS, GUNN & DIAL, LLC

/s/Richard H. Hill  
Richard H. Hill  
Georgia Bar No. 354425

*Attorneys for Defendant Rough Country,  
LLC*

EXHIBIT "A"

The witness shall produce all of the following documents and things which are in his actual or constructive possession, custody, or control:

1.

Your current curriculum vitae.

2.

All treatises, books, pamphlets, articles, data, data compilations, charts, graphs, which you have authored, published, edited, researched, prepared, or to which you have contributed in any way, dealing with or relating to any issue involved in this case.

3.

Any and all reports and other communications authored by you concerning this case.

4.

Any and all documents and tangible things, including, but not limited to, all reports, testing protocol, physical models, data, compilations of data, charts, graphs, photographs, video, programs, and other materials prepared by or relied upon by you in forming any of your opinions or mental impressions in connection with this case.

5.

Any and all documents and things in your possession (actual or constructive) concerning or relating to an investigation of the event(s) and condition(s) involved in this lawsuit.

6.

A copy of every article, publication or textbook upon which you relied or to which you have referred in forming any of the opinions expressed or to be expressed by you, including, but not limited to, the title, author, publisher's name and the name and date of the publication.

7.

List of all other cases in which you have testified as an expert at trial or by deposition within the preceding four (4) years.

8.

Copies of any and all documents studied, reviewed or in any way relied upon by you that support the opinions or the basis for your opinions.

9.

Copies of all records, data compilations, notes analyses, consultation reports, videos and other work product related to any issue in this case.

10.

Copies of any and all invoices or statements for services rendered prepared or submitted for consideration which in any manner whatsoever relates to any issue in this case.

11.

Any other tangible thing related to your anticipated testimony at trial.

12.

Any and all other materials in your file if not already referenced herein.